

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION) Master File No. 3:15-cv-3747-JD
) CLASS ACTION

This Document Relates to:) DECLARATION OF KENDRICK JAN
ALL ACTIONS) IN SUPPORT OF MOTION OF
) OBJECTORS FRANKFOTHER AND
) FLANAGAN FOR ATTORNEY'S FEES
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I, Kendrick Jan, declare as follows:

1. I am an attorney licensed to practice in the State of California (SBN 105149) and a member of the bar of the United States District Court, Northern District of California. I have been an active member of the State Bar of California for 38 years, and my current business address is 402 West Broadway, Suite 1520, San Diego, California 92101.
2. Along with attorney John J. Pentz, I represent objectors Dawn Frankfother and Cathy Flanagan in the captioned matter, and make this declaration in support of their motion for attorney's fees.
3. I have individually expended at least 64.7 hours in representing the interest of my clients, whose objection was brought toward the benefit of all Class Members.
4. My time records in the captioned matter were personally maintained by me, in hand-written form, on a physical calendar.

5. I have prepared a statement of hours, and a description of my tasks, drawn in connection with the time I spent advocating my clients' position in this case, regarding both substantive settlement issues and Class Counsel's sought attorney fees. See Exhibit A, attached, by this reference incorporated herein and made a part hereof.

6. My rate of \$900 per hour is lower than the current Laffey Matrix would allow (i.e. for an attorney in practice greater than 20 years).

7. I have received no compensation for my work performed in this case.

I declare under penalty of perjury under the laws of the State of California the foregoing to be true and correct.

Date: March 12, 2021

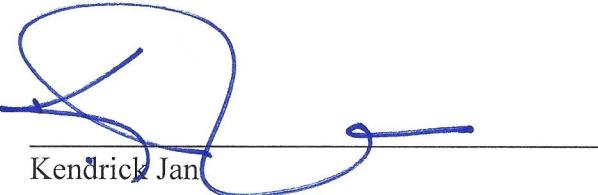
A handwritten signature in blue ink, appearing to read "Kendrick Jan", is written over a horizontal line. The signature is fluid and cursive, with a large loop on the left and a smaller loop on the right.

EXHIBIT A

Kendrick Jan, APC
Attorney at Law

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 San Diego, California 92101
 Telephone: (619) 231-7702
 Email: kj@jan-law.com

STATEMENT OF HOURS AND DESCRIPTION OF SERVICES

Re: *In re: Facebook Biometric Information Privacy Litigation*
 U.S.D.C. Case No. 3:15-cv-3747-JD

Following is a statement of time spent by attorney Kendrick Jan in the above-referenced matter:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
Nov. 2, 2020	Client consult; obtain documents (e.g. Class Certification Order; Consolidated Class Complaint; FB Answer; FB Amended Answer; Long Form Notice; Prelim. Approval Order; appellate filings (incl. amicus briefs), etc.	1.3
Nov. 3, 2020	Review case documents; review Prelim. Approval Hrg transcript; client consult	4.6
Nov. 6, 2020	Additional review of case documents; case analysis; confer with JJ Pentz	2.2
Nov. 10, 2020	Case research; initiate objection	5.1
Nov. 11, 2020	Draft objection (cont'd)	3.4
Nov. 12, 2020	Draft objection (cont'd); confer w/JJ Pentz	1.5
Nov. 13, 2020	Confer w/JJ Pentz	1.2
Nov. 16, 2020	Client consult; email client; draft objection (cont'd)	2.8
Nov. 18, 2020	Draft objection (cont'd); confer w/JJ Pentz	3.2
Nov. 19, 2020	Draft objection (cont'd); call w/clients	3.3
Nov. 20, 2020	Finalize objection; confer w/JJ Pentz; file objection	1.9
Nov. 24, 2020	Communications w/Class Counsel; confer w/JJ Pentz; research	2.8
Nov. 25, 2020	Confer w/JJ Pentz re: Class Counsel demands	1.4
Dec. 1, 2020	Email JJ Pentz re: Class Counsel's discovery motion	0.1

Firm Lodestar Calculation
In re Facebook Information Privacy Litigation
 Page 2

Dec. 2, 2020	Research and initiate Draft opposition to discovery motion; call w/client (Frankfurther) email exchange w/JJ Pentz	5.6
Dec. 3, 2020	Calls w/client; draft opposition to discovery motion (cont'd); draft client declarations ISO; email exchange w/JJ Pentz; email exchange w/clients	8.2
Dec. 4, 2020	Client email (Flanagan); filing of opposition	0.3
Dec. 8, 2020	Review Final Approval Brief; zoom conference w/JJ Pentz	3.3
Dec. 9, 2020	Conference with JJ Pentz	0.2
Dec. 14, 2020	Review Amended Motion for Final Approval	1.2
Dec. 15, 2020	Draft opposition to Amended Motion for Final Approval; email JJ Pentz	2.5
Dec. 16, 2020	Review expert declaration ISO Amended Motion for Final Approval; draft opposition (cont'd); email JJ Pentz re: opposition	3.0
Dec. 17, 2020	Finalize opposition to Amended Motion for Final Approval; email exchange w/JJ Pentz; confer w/JJ Pentz	1.2
Jan. 4, 2021	Call clerk; email JJ Pentz	0.2
Jan. 12, 2021	Pre-hearing research and conference w/JJ Pentz	2.5
Jan. 14, 2021	Final Approval Hearing	<u>2.2</u>
TOTAL:		<u>64.7</u>

Total 2020-2021 hours: **64.7**
Total Lodestar at \$900/hr.: **\$58,230.00**

Cordially,



Kendrick Jan
 Kendrick Jan, APC